

EXHIBIT 2

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ATTORNEYS FOR PLAINTIFFS

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

MO POW 3, LLC and MO POW 4, LLC,

Plaintiffs,

v.

Crypto Infiniti LLC,

Defendant.

Civil Action No. 22-CV-155-SWS

AFFIDAVIT OF THOMAS GUEL

I, Thomas Guel, being of legal age and sworn under oath, declare under penalty of perjury that the following facts are true and correct and within my personal knowledge:

1. I am the manager of MO POW 3, LLC and MO POW 4, LLC and acted as their respective decisionmaker and operator.

2. To prepare each of the sites described in the First and Second Agreement, MO POW spent millions of dollars to get mobile data centers, concrete pads, transformers, leases, permits, and tariffs necessary to construct the sites for Crypto's equipment.

3. Had Crypto shipped equipment to either site, MO POW could have completed the site between the time of shipping and the commencement date in the Agreements. The reason for this is that MO POW does not build the sites in a traditional sense; it assembles them using

prefabricated equipment and infrastructure. As explained above, MO POW had already secured the prefabricated materials. To assemble a site, MO POW, on day one of the assembly, would set the prefabricated concrete pads, the transformers and mobile data units with a crane; then over the next few days, run the necessary electrical wiring to the transformer and then to their corresponding mobile data units. In tandem, MO POW would run the fiber optic cable for internet access to the data centers and install MO POW's control server equipment. Moreover, MO POW's team had experience assembling these kinds of sites, giving them the expertise to be efficient.

4. While it is true Crypto requested heating data, MO POW could not provide heating data on other customers equipment pursuant to the contracts with those clients. Those contracts contain non-disclosure provisions. Heating data is kept confidential because it is sensitive information related to other customers that could provide information about hash rate, operating procedures, and revenues.

FURTHER AFFIANT SAYETH NAUGHT

Dated this 12th day of January 2024.

A handwritten signature in black ink, appearing to read 'Thomas Guel', is written over a horizontal line.

Thomas Guel

STATE OF Illinois)

COUNTY OF Cook)

Signed and sworn to before me this 12 day of January, 2024 by Thomas Guel.

WITNESS my official hand and seal.



Charles R. Cancanelli
Notary Public

My Commission Expires: 10/21/2024

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